

The Honorable Brian D. Lynch
Chapter 7

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON**

In Re:

Case No.: 19-42329-BDL

Ericka Anne Michal

Chapter 7

Debtor.

DECLARATION OF DOUGLAS L. THEENER
IN SUPPORT OF MOTION BY JPMORGAN CHASE BANK, NATIONAL ASSOCIATION
FOR RELIEF FROM THE AUTOMATIC STAY

I, Douglas L. Theener, declare:

1. I am over the age of eighteen and am authorized to make this declaration on behalf of JPMorgan Chase Bank, National Association ("Chase")

2. I am presently a Vice President for Chase. In this position, I have access to the business records of Chase, and my responsibilities include ascertaining and verifying amounts due and payable as to delinquent bankruptcy accounts.

3. The facts stated in this declaration are based upon information that I obtained by reviewing records maintained in the ordinary course of Chase's business, as part of regularly conducted business activity, by or from information transmitted by person(s) with knowledge of the events described therein, at or near the time of the event described.

4. Chase is the servicer and holds the note made by Ericka A Michal executed a note dated October 13, 1998 in favor of Washington Mutual Bank, a Washington Corporation, in the original principal sum of \$113,044.00 (the "Note").

5. The original Note is currently held by Chase at the vault located at 780 Delta Dr. Monroe, LA 71203. An image of the note is available on Chase's electronic imaging system.

Declaration in Support of Motion for Relief from Stay - 1
MH# WA-19-157172

McCarthy & Holthus, LLP
108 1st Avenue South, Ste. 300
Seattle, WA 98104
(206) 596-4856

Reviewer ID: Douglas_Theener_2019-10-23_13:07:48

1 Chase maintains a computer tracking system on collateral, including the Note which is
2 maintained in Chase's collateral file.

3 6. The Note is secured by a Deed of Trust encumbering certain real property
4 commonly known as 1627 6th Ave SW, Puyallup, WA 98371.

5 7. The unpaid principal balance of this loan as of September 1, 2019 is \$127,199.64
6 together with accrued interest in the amount of \$47,804.20, for a combined total of \$175,003.84.

7 8. Interest continues to accrue from the date set forth in paragraph 4, above, at the rate
8 5.500% per year.

9 9. The Debtor failed to make payments with respect to this loan during the months of
10 December, 2012, January, 2013, February, 2013, March, 2013, April, 2013, May, 2013, June,
11 2013, July, 2013, August, 2013, September, 2013, October, 2013, November, 2013, December,
12 2013, January, 2014, February, 2014, March, 2014, April, 2014, May, 2014, June, 2014, July,
13 2014, August, 2014, September, 2014, October, 2014, November, 2014, December, 2014,
14 January, 2015, February, 2015, March, 2015, April, 2015, May, 2015, June, 2015, July, 2015,
15 August, 2015, September, 2015, October, 2015, November, 2015, December, 2015, January,
16 2016, February, 2016, March, 2016, April, 2016, May, 2016, June, 2016, July, 2016, August,
17 2016, September, 2016, October, 2016, November, 2016, December, 2016, January, 2017,
18 February, 2017, March, 2017, April, 2017, May, 2017, June, 2017, July, 2017, August, 2017,
19 September, 2017, October, 2017, November, 2017, December, 2017, January, 2018, February,
20 2018, March, 2018, April, 2018, May, 2018, June, 2018, July, 2018, August, 2018, September,
21 2018, October, 2018, November, 2018, December, 2018, January, 2019, February, 2019, March,
22 2019, April, 2019, May, 2019, June, 2019, July, 2019, August, 2019. The total contractual
23 arrearage due as of September 1, 2019 is: \$91,278.52. Please note that additional payments will
24 come due after September 1, 2019.

25
26 10. The sums set forth in this declaration do not include any late charges, escrow
27 advances, attorneys' fees, costs, or other fees and charges that might otherwise be included in
28 the event that a payoff is requested or provided.
29
30

1 11. The Note, and Supplemental Riders, Amendments, Modifications, Deed of Trusts
2 and Assignments, if any, are attached hereto as Exhibit "A" and are true and correct copies of
3 the originals.

4 I declare under penalty of perjury that the foregoing is true and correct and that this
5 declaration was executed at 3415 Vision Drive, Columbus, OH 43219 on
6 October 23rd, 2019.

7 Douglas L. Theener 10/23/2019

8 **DECLARANT**

9 Name: Douglas L. Theener

10 Title: Vice President

11 Company: JPMorgan Chase Bank, N.A.

12 Date: October 23rd, 2019